

UNITED STATES BANKRUPTCY COURT
FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In re: : **Chapter 13**
STEPHEN FOX : **Case No. 11-18553-BFK**
Debtors :

Suntrust Mortgage :
Plaintiff : **Relief From Stay**
v. : **Contested Matter**
Stephen Foz : **No.**
Respondent :

DEBTORS ANSWER TO MOTION FOR RELIEF FROM STAY OF
SUNTRUST MORTGAGE

Debtor, through undersigned counsel, responds to the Motion for Relief from the Automatic Stay filed herein by Suntrust Mortgage, as follows:

1. The allegations of paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11 are admitted.
2. The allegations of paragraph 12, 13, 14 and 15 are denied.

**Nathan Fisher, VSB #37161
Counsel for Debtor
3977 Chain Bridge Rd., #2
Fairfax, VA 22030
(703) 691-1642**

3. The subject property is necessary for an effective reorganization as it constitutes a primary motivation for the filing of the petition herein;

WHEREFORE, because 11 U.S.C. 362(d) of the Bankruptcy Code provides that the Court shall grant a party in interest relief from the stay:

(1) "for cause, including the lack of adequate protection of an interest in property of such party in interest," (11 U.S.C. 362(d) (1)), or, alternatively,

(2) if "the debtor does not have an equity in such property and such property is not necessary to an effective reorganization," (11 U.S.C. 362(d) (2) (A) & (B)), and because in this case the movant's interest in the subject property is adequately protected and the subject property is necessary to an effective reorganization, Debtor requests that this Court deny Plaintiff's Motion for Relief from Stay, and for such other relief as this Court deems appropriate.

Dated: February 29, 2012

Respectfully Submitted
Stephen Fox
By Counsel:
/s/ Nathan Fisher
Nathan Fisher
3977 Chain Bridge Rd., #2
Fairfax, VA 22030
(703) 691-1642

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of February, 2012, I served the foregoing, via first-class mail, on the following, who are all necessary parties under Local Rule 4001(a)-1(E)(1):

**Thomas Gorman
300 N. Washington Street,
Suite 400
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**Stephen Fox
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**Melissa Watson Goode, Esq.
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**/s/ Nathan Fisher
Nathan Fisher**